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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,) Criminal No. CR 07-0094 MAG
14 Plaintiff,)
15 v.) [PROPOSED] ORDER AND
16 SHAUN C. BATES,) STIPULATION EXCLUDING TIME
17 Defendant.) FROM JUNE 6, 2008 TO JUNE 20, 2008
18 _____)
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21 The parties appeared before the Honorable Joseph C. Spero on June 6, 2008.
22 With the agreement of counsel for both parties, the Court found and held as follows:

23 1. The parties agree to an exclusion of time under the Speedy Trial Act, 18 U.S.C. §
24 3161(b), from June 6, 2008, to June 20, 2008, due to the fact that Ron Tyler, the assigned
25 defense counsel, was unavailable on June 6, 2008, and Assistant Federal Public Defender Steve
26 Kalar stood in on behalf of Mr. Tyler for the defendant. For the purposes of continuity of
27 counsel, time was excluded. Failure to grant the requested continuance would unreasonably
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[PROPOSED] ORDER AND
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1 deny defense counsel continuity of counsel.
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3 2. Given these circumstances, the Court found that the ends of justice served by
4 excluding the period from June 6, 2008, to June 20, 2008, outweigh the best interest of the public
5 and the defendant in a speedy trial. Id. § 3161(h)(8)(A).

6 3. Accordingly, and with the consent of the defendant, the Court ordered that the period
7 from June 6, 2008, to June 20, 2008, be excluded from Speedy Trial Act calculations under 18
8 U.S.C. § 3161(h)(8)(A) & (B)(iv).
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10 IT IS SO STIPULATED.

11 DATED: 7/1/08

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13 _____
14 /s/
15 STEVE KALAR
16 Assistant Federal Public Defender

17 DATED: 6/30/08

18 _____
19 /s/
20 WENDY THOMAS
21 Special Assistant U.S. Attorney

22 IT IS SO ORDERED.

23 DATED: 7/14/08

